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10 *Attorneys for Defendants*

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UNITED STATES DISTRICT COURT

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CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

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*In re: Hyundai and Kia Engine
Litigation*

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CASE NO. 8:17-cv-00838

Member Cases:

8:17-cv-01365-JLS-JDE

8:17-cv-02208-JLS-JDE

2:18-cv-05255-JLS-JDE

8:18-cv-00622-JLS-JDE

Related Case:

8:18-cv-02223-JLS-JDE

**DECLARATION OF SHON
MORGAN IN SUPPORT OF
DEFENDANTS' UNOPPOSED
NOTICE OF MOTION AND
MOTION FOR COURT
APPROVAL OF SETTLEMENT
WITH OBJECTOR MEGHAN
JONES**

1 1. I am a member of the bar of the State of California and a partner with
2 Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for defendants Hyundai Motor
3 America, Inc., Hyundai Motor Company, Kia Motors America, Inc., and Kia Motors
4 Corporation. I make this declaration of personal, firsthand knowledge, and if called
5 and sworn as a witness, I could and would testify competently thereto.

6 2. I make this declaration in support of defendants' Notice of Motion and
7 Motion for Court Approval of Settlement with Objector Meghan Jones.

8 3. I have conferred on multiple occasions with Class Counsel about the
9 relief sought by this motion and they do not oppose.

10 4. **Exhibit A** to the motion is a true and correct copy of the settlement
11 agreement with Ms. Jones, which includes the amount to be paid to Ms. Jones.

12 5. It is my understanding that HMA and Ms. Jones negotiated a settlement
13 amount based on her vehicle's Kelley Blue Book value assuming it was in excellent
14 condition.

15 6. I declare under penalty of perjury under the laws of the United States of
16 America that the foregoing is true and correct.

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19 DATED: November 23, 2020

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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Bv/s/ Shon Morgan

Shon Morgan

Attorneys for Kia Motors America, Inc.,
Kia Motors Corporation, Hyundai Motor
America, Inc., and Hyundai Motor
Company, Ltd.

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